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Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re) Case No. 16-30406-rld11
)
SeaPort Airlines, Inc.,) DEBTOR'S MOTION TO EXTEND BY 90 DAYS
) THE TIME TO ASSUME OR REJECT CERTAIN
) UNEXPIRED LEASES OF NONRESIDENTIAL
Debtor-in-Possession.) REAL PROPERTY

Debtor moves the Court pursuant to 11 U.S.C. § 365 D(4)(B) to extend by 90 days the time to assume or reject certain unexpired leases of nonresidential real property under which the Debtor is a lessee as shown on **Exhibit A** attached hereto.

The decision whether to assume or reject such leases should be made in conjunction with the presentation and confirmation of Debtor's anticipated Plan of Reorganization. Debtor expects to file the Plan and Disclosure Statement by July 11, 2016. To the extent that Debtor continues to occupy and use the premises represented by each lease shown on **Exhibit A** attached, the Debtor has been and will continue to pay

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monthly rent in the amounts and at the dates called for by each respective nonresidential real property lease.

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos
Robert J Vanden Bos, OSB #78100
Douglas R. Ricks, OSB #044026
Christopher N. Coyle, OSB #07350
Of Attorneys for Debtor-in-Possession

Summary of Non-Residential Leases
Request for Extension of Time to Assume or Reject

#	Name of Lessor	Lease Title	Description of Leased Premises
1	The Boone County Airport Administrative Board	Lease Agreement	Airport - Counter and office space
2	City of El Dorado	Unwritten Lease/Operating Agreement	Airport - Counter/office space
3	City of Hot Springs	Lease Agreement	Airport - Hot Springs Terminal Building - Ticket counter, office, holdroom
4	City of Pendleton	Eastern Oregon Regional Airport Non-Exclusive Use Agreement for Airline Operations - SeaPort Airlines, Inc.	Airport - Eastern Oregon Regional Airport - Ticket counter, office, holdroom
5	City of Houston	Airport Use and Lease Agreement by and between City of Houston and Seaport Airlines, Inc. - Effective September 14, 2015	Airport - Office/gate/counter space
6	Signature Flight Support Corporation	Hangar Sublease and Limited Operating Rights Agreement by and between Signature Flight Support Corporation and Sea Port Air Operations LLC covering real property located at Memphis International Airport Memphis, Tennessee effective September 1, 2009	Memphis International Airport - Hangar 1A -includes lobby/counter, hangar/mx office space/office and training area upstairs
7	Eastern Oregon Regional Airport (City of Pendleton)	Pilot House - Month to Month City of Pendleton	Crew Apartment at 2600 Airport Rd, Pendleton OR 97801
8	Port of Portland	Amended and Restated Signatory Passenger Airline Lease and Operating Agreement	Airport - Portland International Airport - Ticket counter, office, shared use holdroom

CERTIFICATE - TRUE COPY

DATE: May 13, 2016

DOCUMENT: DEBTOR'S MOTION TO EXTEND BY 90 DAYS THE TIME TO
ASSUME OR REJECT CERTAIN UNEXPIRED LEASES OF
NONRESIDENTIAL REAL PROPERTY

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

SEE ATTACHED LIST. (The original Service List is attached to the original copy filed with the Court only. Creditors may request a copy of the Service List by contacting the undersigned.)

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: May 13, 2016

VANDEN BOS & CHAPMAN, LLP

By: /s/Robert J Vanden Bos
Robert J Vanden Bos, OSB #78100
Douglas R. Ricks, OSB #044026
Christopher N. Coyle, OSB #07350
Of Attorneys for Debtor-in-Possession

In re SeaPort Airlines, Inc.;
Chapter 11 Bankruptcy Case No. 16-30406-rld11
Service List

First Class Mail:

SeaPort Airlines, Inc.
Attn: Timothy Sieber
816 SW First Avenue
Portland, Oregon 97204

City of El Dorado
PO Box 2170
El Dorado, AR 71731-0000

City of Hot Springs
133 Convention Boulevard
Hot Springs National Park, AR
71901-0000

Port of Portland
Portland International Airport
P.O. Box 5095
Portland, OR 97208

**CHAIRPERSON OF COMMITTEE
OF UNSECURED CREDITORS:**

JA Flight Services, LLC
c/o Bruce A. Jacobs, President
Creditors Committee Chairperson
43W700 US Route 30
Sugar Grove, IL 60554

City of Hot Springs
PO Box 700
Hot Springs, AR 71902

City of Pendleton - Airport
2016 Airport Road
Pendleton, OR 97801-0000

Port of Portland
Attn: Chief Operating Officer
7200 SE Airport Way
Portland, OR 97218

Port of Portland
Attn: General Counsel
7200 SE Airport Way
Portland, OR 97218

SPECIAL NOTICE:

Tulare County Tax Collector
Attn Jorge Garcia Deputy
Tax Collector
221 S Mooney Blvd Rm 104-E
Visalia, CA 93291-4593

City of Pendleton
Airport Manager
500 SW Dorian Ave
Pendleton, OR 97801-0000

Houston Airport System
P.O. Box 204172
Houston, TX 77216-0000

Port of Portland
Attn: General Manager
Aviation Business & Properties
7200 SE Airport Way
Portland, OR 97218

Signature Flight Support Corp.
Attn: General Manager
Memphis International Airport
2488 Winchester Road
Memphis, TN 38116

Michael J. Edelman
VEDDER PRICE
1633 Broadway
47th Floor
New York, New York 10019

City of Houston
Director of Aviation
16930 J.F. Kennedy Blvd
Houston Intercontinental Airport
Houston, TX 77032

Signature Flight Support Corp.
Attn: Contracts
201 South Orange Ave., Ste. 1100
Orlando, FL 32801

Franklin C. Adams
POB 1028
Riverside, CA 92502-1028

City of Houston
Legal Department
c/o Sr. Asstnt City Attorney
M. Lucille Anderson
PO Box 368
Houston, TX 77001

Electronic Mail:

The foregoing was served on all
CM/ECF participants through the
Court's Case Management/
Electronic Case File system.

Mark J. Wolfson
100 N Tampa St #2700
Tampa, FL 33602

Leaseholders:

Boone County Airport
P.O. Box 1114
Harrison, AR 72602-0000

Memphis International Airport
2491 Winchester Rd. Suite 113
Memphis, TN 38116-0000

Pendleton Crew Apartment
500 SW Dorian Ave
Pendleton, OR 97801-0000

The Boone County Airport
Administrative Board
P.O. Box 1114
Harrison, AR 72602-0000

Eastern Oregon Regional Airport
(City of Pendleton)
500 SW Dorian Ave
Pendleton, OR 97801